

UNITED STATES DISTRICT COURT  
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
SUN, WEI QIN, )  
 )  
Defendant. )  
 )  
\_\_\_\_\_ )

Criminal Case No. 07-00009

STIPULATED STATEMENT OF THE  
CASE AND ELEMENTS OF THE  
CHARGES

Trial: October 15, 2007  
Time: 9:00 a.m.  
Judge: Hon. Alex R. Munson

The parties in the above-captioned case hereby stipulate and agree to the attached  
proposed statement of the case and the elements of the charges.

LEONARDO M. RAPADAS  
United States Attorney  
District of the Northern Mariana Islands

\_\_\_\_\_/s/\_\_\_\_\_  
JOSEPH N. CAMACHO  
Attorney for Defendant

By:\_\_\_\_\_/s/\_\_\_\_\_  
ERIC S. O'MALLEY  
Assistant U.S. Attorney

DATE: 10/08/2007

DATE: 10/08/2007

UNITED STATES v. SUN, WEI QIN

STATEMENT OF THE CASE

In this case, the government alleges that the defendant conspired to commit, and actually did commit: First, the crime of sex trafficking, specifically, the government alleges that the defendant induced a woman to come from China to Saipan with false promises of a high paying job as a waitress, when in fact, the defendant intended that the woman work as a prostitute; second, the crime of foreign transportation of a person in execution of a fraud scheme, specifically, the defendant made the woman pay thousands of dollars in fees to obtain entry into the C.N.M.I., keeping most of the money for herself. The defendant denies these allegations and is presumed innocent until proven guilty beyond a reasonable doubt.

UNITED STATES v. SUN, WEI QIN

ELEMENTS OF THE CHARGES

**Count One: Conspiracy**

The defendant is charged in Count One of the Indictment with conspiring to commit offenses against the United States, in violation of Title 18, United States Code, Section 371. In order for the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, beginning on or about October 2006, and ending on or about May 2007, there was an agreement between two or more persons to commit at least one crime as charged in the indictment;

Second, the defendant became a member of the conspiracy knowing at least one of its objects and intending to help accomplish it; and

Third, one of the members of the conspiracy performed at least one overt act for the purpose of carrying out the conspiracy, with all of you agreeing on a particular overt act that you find was committed.

**Count Two: Coercion and Enticement**

The defendant is charged, as one of the objects of the conspiracy charged in Count One, and in Count Two of the Indictment with persuading, inducing enticing or coercing, or attempting to persuade, induce, entice or coerce, a person to travel in foreign commerce for the purpose of prostitution, in violation of Title 18, United States Code, Sections 2422 and 2. In order for the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, that the defendant knowingly persuaded, induced, enticed, or coerced an individual to travel in foreign commerce; and

Second, the defendant intended that the person would engage in prostitution or in any sexual activity for which any person can be charged with a criminal offense.

**Count Three: Foreign Transportation of a Person in Execution of a Scheme to Defraud**

The defendant is charged, as one of the objects of the conspiracy charged in Count One, and in Count Three of the Indictment with foreign transportation of a person in execution of a fraud scheme, in violation of Title 18, United States Code, Sections 2414 and 2. In order for the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, the defendant made up a scheme or plan for obtaining money by making false promises or statements, with all of you agreeing on at least one of the particular false promises or statements that was made;

Second, the promises or statements were material, that is they would reasonably influence a person to part with money or property;

Third, the defendant acted with the intent to defraud; and

Fourth, on or about the date alleged in the count you are considering, the defendant transported, or induced a person to travel in interstate or foreign commerce in the execution or concealment of the scheme or plan to defraud such person of more than \$5,000.